

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT**

**JENNIFER A. CONNORS,**

**PLAINTIFF**

**v.**

**DARTMOUTH HITCHCOCK MEDICAL CENTER,  
DARTMOUTH MEDICAL SCHOOL,  
MARY HITCHCOCK MEMORIAL HOSPITAL,  
DARTMOUTH-HITCHCOCK CLINIC and  
TRUSTEES OF DARTMOUTH COLLEGE,**

**DEFENDANTS**

**CASE NO. 2:10-cv-94**

**STIPULATED DISCOVERY SCHEDULE/ORDER**

The parties submit the following Discovery Schedule pursuant to Local Rule 26.1(b):

1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before August 27, 2010.
2. The parties shall serve all interrogatories and request for production on or before October 15, 2010.
3. Depositions of all non-expert witnesses shall be completed by January 10, 2011.
4. Plaintiff shall submit expert witness reports on or before September 1, 2010.  
Depositions of plaintiff's experts shall be completed by October 15, 2010.
5. Defendant shall submit expert witness reports on or before November 1, 2010.  
Depositions of defendant's experts shall be completed by December 15, 2010.
6. The Early Neutral Evaluation session shall be conducted on January 12, 2011 at 10:00 a.m. The parties have agreed that Potter Stewart, Jr., Esq. will serve as the

early neutral evaluator.

7. The parties shall serve all requests for admission on or before February 1, 2011.
8. All discovery shall be completed by February 11, 2011 (no later than 8 months after filing of the Answer or Third-Party Answer).
9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before November 1, 2010.
10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before January 15, 2011.
11. This case shall be ready for trial by February 11, 2011.

Dated: 7/22/10.

/s/ Norman E. Watts  
Norman E. Watts, Esquire  
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Attorney for Plaintiff

Dated: 7/22/10.

/s/William D. Pandolph  
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Attorney For Defendants

/s/Edward M. Kaplan  
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Attorney For Defendants  
*Admitted Pro Hac Vice*

Dated: July 26, 2010

**APPROVED and SO ORDERED:**

/s/ William K. Sessions III  
William K. Sessions III  
Chief Judge, U.S. District Court